## STATE OF MICHIGAN IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

Jermaine Armstrong,

Plaintiff,

Case No. 20-cv-10878 Hon, Gershwin A. Drain

VS.

ALLCLEAR, LLC, et al,

Defendants.

MEROUEH & HALLMAN, LLP

By: Zachary A. Hallman (P78327)

Odey K. Meroueh (P76460)

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## PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE

In response to this Honorable Court's ORDER to SHOW CAUSE, as to why this matter should be dismissed for failure to prosecute, Plaintiff, through his Counsel, Meroueh and Hallman, LLP, states as follows:

- 1. Plaintiff through counsel has been in communications with communications for Defendant previous to the date that this instant Complaint was filed, in an attempt to resolve this matter before filing.
- 2. Upon filing, Plaintiff's counsel, Zachary A. Hallman, was in the course of negotiations with counsel for Defendant Allclear, whom had been retained in response to an administrative filing of Plaintiff's in the Equal Employment Opportunity Commission.

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3. Such negotiations have since stalled, and Plaintiff's counsel was forced to take some time

out of the office during the months of May and June of this year, unexpectedly.

4. Plaintiff asks that this Court permit an additional 14 days of service so that, barring

Defendant's counsel refusing to acknowledge service – such request is currently pending

– then proper service can be effectuated.

Dated: 8/17, 2020

/s/ Zachary A. Hallman
Zachary A. Hallman, P78327
Attorney for Plaintiff